

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

WOODBIDGE GROUP OF COMPANIES,
LLC, *et al.*,¹

Remaining Debtors.

Chapter 11

Case No. 17-12560 (JKS)

MICHAEL GOLDBERG, in his capacity as
Liquidating Trustee of the WOODBRIDGE
LIQUIDATION TRUST,

Plaintiff,

v.

ANDREW R. VARA, in his capacity as the
United States Trustee for Region 3; TARA
TWOMEY, in her official capacity as Director
of the Executive Office for United States
Trustees; and THE UNITED STATES
TRUSTEE PROGRAM,

Defendants.

Adversary No. 22-50516 (JKS)

**CERTIFICATION OF COUNSEL REGARDING AGREED ORDER FOR
DEFENDANTS' MEMORANDUM OF LAW IN SUPPORT OF
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND
RESPONSE TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT
TO EXCEED PAGE LIMIT**

¹ On February 25, 2019, the Court entered an order closing the Bankruptcy Cases of all Debtors except Woodbridge Group of Companies, LLC and Woodbridge Mortgage Investment Fund 1, LLC (together, the "Remaining Debtors"). The Remaining Debtors' Bankruptcy Cases are being jointly administered under Case No. 17-12560 (KJC). The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors' mailing address is 14140 Ventura Boulevard, #302, Sherman Oaks, California 91423.

The undersigned counsel to the above-captioned defendants hereby certifies as follows regarding an Agreed Order for the *Defendants' Memorandum of Law in Support of Defendants' Motion for Summary Judgment and Response to Plaintiff's Motion for Summary Judgment* to exceed the page limits of Local Rule 7007-2(a)(iv):

1. The Court entered the Order Approving Stipulation for Summary Judgment Briefing Schedule on May 29, 2023. (D.I. 10) (the "Summary Judgment Briefing Schedule Order").

2. The Stipulation approved by the Summary Judgment Briefing Schedule Order, included agreement by the parties to seek leave from the Court "to exceed by no more than ten (10) pages the page limitations set forth in Local Rule 7007-2(iv)[sic]." Stipulation at D.I. 10-1 at ¶ 4.

3. The Defendants intend to file a combined response to the Plaintiff's Motion for Summary Judgment and Defendants' Cross-Motion for Summary Judgment, which under Local Rule 7007-2(a)(iv) could both be thirty (30) pages in length, exclusive of any tables of contents and citations. Given the overlap of issues and to promote judicial economy, the Defendants seek the Court's leave to file the *Defendants' Memorandum of Law in Support of Defendants' Motion for Summary Judgment and Response to Plaintiff's Motion for Summary Judgment* exceeding the thirty (30) page limitation.

4. A copy of this Certification and proposed order was shared with counsel to the Plaintiff, who indicated no objection to entry of the proposed order.

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WHEREFORE, Defendants respectfully request that the Court sign and enter the attached proposed order and grant such other and further relief as it deems appropriate.

Date: September 13, 2023

Respectfully submitted,

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By: /s/ Timothy J. Fox
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